

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Cynthia Lynn Craig-Halbleib

Debtor(s)

The Money Source Inc.

Movant

v.

Cynthia Lynn Craig-Halbleib

Debtor(s)

Keith Craig-Halbleib

Co-Debtor

and

Charles J. DeHart, III Esq.

Trustee

BK. NO. 20-00836 HWV

CHAPTER 13

MOTION FOR RELIEF FROM THE AUTOMATIC STAY & CO-DEBTOR RELIEF

Date: December 18, 2020

/s/ Rebecca A. Solarz, Esq.

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Cynthia Lynn Craig-Halbleib

Debtor(s)

CHAPTER 13

The Money Source Inc.

Movant

v.

Cynthia Lynn Craig-Halbleib

Debtor(s)

NO. 20-00836 HWV

Keith Craig-Halbleib

Co-Debtor

and

Charles J. DeHart, III Esq.

Trustee

11 U.S.C. Section 362 and 1301

MOTION OF The Money Source Inc.
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362 and 1301

1. Movant is The Money Source Inc..
2. Debtor and Keith Craig-Halbleib, co-debtor are the owner(s) of the premises 6212 Nassau Road , Harrisburg, PA 17112, hereinafter referred to as the mortgaged premises.
3. Charles J. DeHart, III Esq., is the Trustee appointed by the Court.
4. Movant is the holder of a mortgage, original principal amount of \$128,113.00 on the mortgaged premises that was executed on June 5, 2017 and recorded on June 7, 2017 in Dauphin County at Instrument Number 20170014491. The mortgage has been assigned as follows:

“MERS.” As Mortgagee, As Nominee for 1st Alliance Lending, LLC Its successors and Assigns to The Money Source Inc, recorded on December 3, 2019 at Instrument Number 20190030936.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$1,153.65 for the months of October 2020 through December 2020.
7. The total amount necessary to reinstate the loan post-petition is \$3,460.84.
8. Movant is entitled to relief from the automatic stay for cause pursuant to 11 U.S.C. § 362(d).

9. Debtor is currently delinquent in plan payments to the Chapter 13 Trustee in the amount of \$765.00.

10. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgaged premises.

Date: December 18, 2020
/s/ Rebecca A. Solarz, Esq.

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant